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    Attorney for Defendant
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 7
                       IN THE UNITED STATES DISTRICT COURT
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 9
                     FOR THE EASTERN DISTRICT OF CALIFORNIA
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    UNITED STATES OF AMERICA,
                                     ) CR. NO. S-04-381 FCD
13
                    Plaintiff,
                                        STIPULATION; ORDER
14
                                        Date: May 16, 2005
         v.
                                        Time: 9:30 a.m.
15
                                        Hon. Frank C. Damrell, Jr.
    MIGUEL ANGEL SANCHEZ,
    RICARDO GONZALEZ SALAS, and
                                        "AS MODIFIED"
    OSCAR CANIZALEZ
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                    Defendants.
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         Defendant, Oscar Canizalez, through Christopher Haydn-Myer,
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   Attorney At Law, defendant, Miguel Angel Sanchez, through Mark J.
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   Reichel, and defendant Ricardo Gonzales Salas, through his attorney,
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   Jesse Soto Ortiz, and the United States of America, through Assistant
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   U.S. Attorney Samuel Wong, agree as follows:
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         It is agreed that the current Status Conference date of May 16,
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   2005 be vacated and a new Status Conference date of May 31, 2005 be
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   set.
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         The continuance is necessary because all of the co-defendants are
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receiving new plea agreements, and counsel needs time to review the

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plea agreements with their clients. 1 2 Further, the discovery motion set to be heard on May 17, 2005 before the Honorable Gregory G. Hollows has been rescheduled to June 3 13, 2005 by agreement of all of the parties. 4 5 For all of these reasons, the parties jointly request a new status 6 conference date, and that the time period from May 16, 2005, to and including May 31, 2005 be excluded under the Speedy Trial Act pursuant 7 to 18 U.S.C. §3161(h)(8)(B)(iv) and Local Code T4 for defense 8 9 preparation and based on a finding by the Court that the ends of 10 justice are served by granting the continuance outweigh the best interest of the public and defendant in a speedy trial. Further, that 11 12 time will be excluded because of the discovery motion to be heard on June 13, 2005. 13 14 Dated: May 11, 2005 15 Respectfully submitted, /s/ Christopher Haydn-Myer 16 CHRISTOPHER HAYDN-MYER 17 Attorney for Defendant Oscar Canizalez 18 MCGREGOR SCOTT 19 United States Attorney 20 21 DATED: May 11, 2005 /S/ Christopher Haydn-Myer for SAMUEL WONG 22 Assistant U.S. Attorney Attorney for Plaintiff 23 OUIN DENVIR 2.4 Federal Public Defender 25 DATED: <u>May 11, 2005</u> /S/ Christopher Haydn-Myer for MARK J. REICHEL 26 Assistant Public Defender Attorney for Defendant 27

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Miguel Angel Sanchez 1 2 DATED: May 11, 2005 /S/ Christopher Haydn-Myer for JESSE SOTO ORTIZ III 3 Attorney for Defendant Ricardo Gonzales Salas 4 ORDER 5 6 The Status Conference date of May 16, 2005 is vacated and a new 7 Status Conference date of May 31, 2005 at 9:30 a.m. is set. 8 Further, the discovery motion set to be heard on May 17, 2005 before 9 the Honorable Gregory G. Hollows has been rescheduled to June 13, 2005 at 10 2:00 p.m. before the Honorable Peter A. Nowinski by agreement of all of 11 the parties. 12 Time from May 16, 2005, to and including May 31, 2005 is excluded 13 under the Speedy Trial Act pursuant to 18 U.S.C. §3161(h)(8)(B)(iv) and Local Code T4 14 15 DATED: <u>May 11</u>, 2005 16 /s/Frank C. Damrell Jr. 17 HON. FRANK C. DAMRELL, JR. UNITED STATES DISTRICT JUDGE 18 19 20 21 22 23 24 25 26 27 28 3